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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 AMY BUCHANAN

11 vs.

12 Plaintiff,  
13 vs.  
14 WATKINS & LETOFSKY, LLP., a Nevada  
15 Limited Liability Partnership; and DOES 1-X,  
16 inclusive,

17 Defendants.

Case No.: 2:19-cv-00226-GMN-VCF

18 **STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR FILING  
MOTIONS FOR SUMMARY  
JUDGMENT**

19 **[FIRST REQUEST]**

20 Pursuant to this court's order on Defendant's Motion for Summary Judgment (ECF No.  
21 55), the Stipulated Discovery Plan and Scheduling Order (ECF No. 58) and Federal Rule of Civil  
22 Procedure 26(f), and in accordance with LR IA 6-1, Defendant, Watkins & Letofsky, LLP, and  
23 Plaintiff, Amy Buchanan, by and through their respective counsel, stipulate and hereby submit to  
24 the Court this joint request for a 30 day extension of the deadline for filing dispositive motions as  
25 contained in the Stipulated Discovery Plan and Scheduling Order (ECF No. 58) from October 30,  
26 2023 through and including November 29, 2023. The Parties represent and show the court as  
follows:

27 1. The discovery cut-off date from the Stipulated Discovery Plan and Scheduling  
28 Order (ECF No. 58) was originally set for September 29, 2023, and the dispositive

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29 **STIPULATION TO CONTINUE FILING DEADLINE FOR MOTION FOR SUMMARY JUDGMENT  
AND ORDER**

1 motion filing deadline was set for 30 days later on October 30, 2023 (the 29<sup>th</sup> being  
2 a Sunday).

3 2. The Court granted Plaintiff an extension of time to complete the necessary  
4 depositions to October 9, 2023, as travel plans for the witnesses made it difficult to  
5 schedule the in-person depositions (ECF No. 61).  
6 3. Counsel for Defendant, Daniel Watkins, underwent significant shoulder surgery on  
7 October 6, 2023, limiting his time in the office for several weeks.  
8 4. The parties completed the necessary depositions on October 9, 2023.  
9 5. With the limited time in the office and the time needed to obtain the deposition  
10 transcripts, the parties request a 30-day extension of the dispositive motion filing  
11 deadline making the new deadline November 29, 2023. This first joint request for  
12 an extension of time of the deadline to file dispositive motions.

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1 Good cause exists for the proposed extension of the deadline for filing dispositive  
2 motions, and the parties believe that an extension is necessary. Based on the foregoing, the  
3 parties have agreed that the deadline for filing dispositive motions should be extended until  
4 Wednesday November 29, 2023.

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6 DATE: October 18, 2023  
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8 WATKINS & LETOFSKY, LLP

KEMP & KEMP

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10 */s/ Daniel R. Watkins*

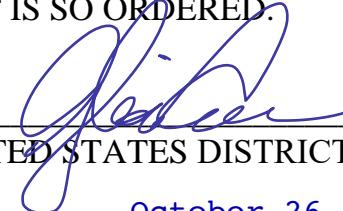
*/s/ J.P. Kemp*

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17 **ORDER**  
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19 IT IS SO ORDERED.  
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UNITED STATES DISTRICT COURT JUDGE

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23 Dated: October 26, 2023